

WHEREFORE, the Defendant, Twitter, Inc., respectfully requests that this Honorable Court:

- A. Grant Twitter's Motion to Dismiss Complaint and dismiss, with prejudice, Plaintiff's claims and this action;
- B. In the alternative, transfer any surviving claims against Twitter to the Northern District of California; and
- C. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

**Twitter, Inc.**

By its attorneys,

ORR & RENO, PROFESSIONAL ASSOCIATION

Dated: June 1, 2020

By: /s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)  
45 S. Main Street, P.O. Box 3550  
Concord, NH 03302  
(603) 223-9100  
jeck@orr-reno.com

Julie E. Schwartz, Esq. (*motion for pro hac vice admission to be filed*)  
Perkins Coie LLP  
3150 Porter Drive  
Palo Alto, CA 94304-1212  
(650) 838-4490  
JSchwartz@perkinscoie.com

### **CERTIFICATE OF SERVICE**

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 1, 2020

/s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)

Respectfully submitted,

**Twitter, Inc.**

By its attorneys,

ORR & RENO, PROFESSIONAL ASSOCIATION

Dated: June 1, 2020

By: /s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)  
45 S. Main Street, P.O. Box 3550  
Concord, NH 03302  
(603) 223-9100  
jeck@orr-reno.com

Julie E. Schwartz, Esq. (*motion for pro hac vice admission to be filed*)  
Perkins Coie LLP  
3150 Porter Drive  
Palo Alto, CA 94304-1212  
(650) 838-4490  
JSchwartz@perkinscoie.com

**CERTIFICATE OF SERVICE**

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 1, 2020

/s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)